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Shrewsbury. What is located at that address?

- A. A repair facility for the public.
- Q. So that's where Trans-Spec carries on the truck repair part of its profit-making business?
- 7 A. Yes.

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- Q. Does Trans-Spec do any repair or
   maintenance work on its own trucks at
   the 307 Hartford Turnpike address?
- 11 A. Emergency repairs.
- Q. So if a truck has a problem and it's close to the 307 Hartford Turnpike address, it might go there for repairs?
- 15 A. Possibly. But generally they supply the 16 road service if there's a problem on the 17 road.
- 18 Q. But scheduled maintenance or maintenance
- that is not being done on an emergency
- basis or repair that's not being done onan emergency basis would not be done at
- the 307 Hartford Turnpike address on
- Trans Special country in Special
- 23 Trans-Spec's own trucks?
- 24 A. Yes.

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- Q. Is 22 Eskow Road a location where
- 2 Trans-Spec does its repair and
- 3 maintenance work on its own trucks?
- A. Yes.
- Q. What else is at the 22 Eskow Road
  address in terms of Trans-Spec's
  business operations?
- 8 A. It has a fabrication shop.
- Q. Is that fabrication shop related to the
   repair and maintenance work that
   Trans-Spec does at that location?
- 12 A. Yes.
- Q. So if it needs to fabricate a bracket or
   a part of some type, it can do it right
   there and then put it on the truck?
- <sup>16</sup> A. Yes.
- Other than the repair facilities and the fabrication shop, what other part of Trans-Spec's business is carried on at 22 Eskow Road?
- <sup>21</sup> A. A dispatch office.
- <sup>22</sup> **Q.** What else goes on at that address?
- <sup>23</sup> A. It's the safety manager's office.
- 24 Q. Corporate safety manager?

- 1 A. Yes.
- 2 Q. What else is carried on at 22 Eskow
- 3 Road?
- 4 A. That is where all the operations records
- 5 are stored.
- 6 Q. What else goes on there?
- 7 A. That's it.
- 8 Q. And I think the last address that you
- 9 identified as being used in Trans-Spec's
- business is 21 Eskow Road which is
- across the road from 22 Eskow Road?
- 12 A. That is a secured parking lot.
- 13 Q. Is that where Trans-Spec keeps its
- 14 trucks when they are not in use?
- 15 A. Yes.
- 16 Q. Does Trans-Spec operate its trucks 24
- hours a day?
- 18 A. Yes.
- 19 Q. Would any given truck typically be
- operated 24 hours a day, or would there
- be a shift when it was not being
  - operated?
- 23 A. Both.

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24 Q. Some of the trucks it operates 24 hours

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- 1 a day?
- 2 A. Some of the trucks some of the time.
- 3 Q. When a truck is not being operated and
- is not actively being serviced at the 22
- 5 Eskow Road facility, would it be parked
- in the lot at 21 Eskow Road?
- 7 A. Yes.
- 8 Q. So the drivers of these trucks don't
- 9 take them home and keep them in their
- 10 driveway?
- 11 A. No.

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- 12 Q. I take it if they are at the 21 Eskow
- Road lot, they are out in the open and
  - they are not in a garage of any type?
- 15 A. Yes. It's a secured parking lot.
- 16 Q. Is it a paved parking lot?
- 17 A. Yes.
- 18 Q. Now, are there Trans-Spec employees
- whose place of work is exclusively the
- 20 307 Turnpike Road location?
- 21 A. Yes.
- 22 Q. Really, what I'm getting at is, are the
- 23 Trans-Spec employees who perform repair
  - and maintenance work on Trans-Spec's own

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